

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO WOMEN IN TRADES,)
)
)
Plaintiff,)
) No. 25 C 2005
v.)
) Judge Kennelly
PRESIDENT DONALD J. TRUMP, *et al.*,)
)
)
Defendants.)

DEPARTMENT OF LABOR AND ACTING SECRETARY OF LABOR VINCENT MICONE'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendants Department of Labor and Acting Secretary of Labor Vincent Micone (collectively, “DOL Defendants”), by their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, respond to plaintiff Chicago Women In Trades’ First Set of Interrogatories to Defendants Department of Labor and Acting Secretary of Labor Vincent Micone as follows:

General Objections

Defendants Department of Labor and Acting Secretary of Labor Vincent Micone (collectively, “DOL Defendants”) object to these interrogatories based on the reasons set forth in defendants’ motion for a protective order to stay discovery pending resolution of their motion to dismiss and the memorandum in support (“Stay Motion”). Dkt. 105, 106. Accordingly, DOL Defendants withhold their responses to these interrogatories until the court resolves the Stay Motion and sets a response deadline to file responses. Until then, DOL Defendants reserve all applicable objections to such interrogatory responses, including but not limited to the extent they seek information protected by any privilege, doctrine, or immunity, including the attorney-client

privilege, the work product privilege, the deliberative process privilege, the law enforcement privilege, and any other applicable privilege.

Interrogatory No. 1: Identify all grants that Defendants have terminated or threatened to terminate based on or as result of the Anti-Diversity EO^s, including but not limited to because Defendant(s) deemed those grants to be “equity related” and/or because Defendant(s) determined that a “counterparty or recipient . . . operate[s] [] programs promoting DEI that violate [] applicable Federal anti-discrimination laws,” and/or because a grantee refused “to certify that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.” For purposes of this interrogatory, “Identify” requests Defendant(s) to provide the name of the grant, the recipient of the grant, the amount of the grant, and the term of the grant.

Response: See General Objections above.

Interrogatory No. 2: Identify all individuals within DOL that have responsibility for determining whether a grant should be terminated based on or as a result of the Anti-Diversity EO^s, including but not limited to individuals responsible for determining whether a grant is “equity related” or promotes or is in any way related to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 3: Identify all grants that Defendants have terminated or identified for termination because Defendant (s) have deemed they contain programming, promote, or in any way relates, to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 4: Describe in detail the process or methodology by which CWIT was identified as a grantee administering programs potentially in violation of the Anti-Diversity EO^s, including but not limited to, the source and type of information used, standards applied, the identifies and roles of each person who participated, including persons involved in deciding what process, methodology, standards specifying any computerized search tool or program used in the process.

Response: See General Objections above.

Interrogatory No. 5: Describe in detail the process or methodology by which Defendants identify grant programs that may be subject to compliance with the Anti-Diversity EO^s, including but not limited to specifying any computerized search tool or program used in the process or methodology.

Response: See General Objections above.

Interrogatory No. 6: Describe in detail what “illegal DEI” and “illegal DEIA” mean as those terms are used at Section 2(a) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 7: Describe in detail how Defendants identify “DEI or DEIA performance requirements” as those terms are used in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 8: Describe in detail what “equity-related grants” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 9: Describe in detail what “DEI hires” means as that term is used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 10: Describe in detail how you determined that CWIT’s programs constitute illegal DEI in violation of the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 11: Describe in detail what “to provide or advance DEI, DEIA, or ‘environmental justice’ programs, services, or activities” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 12: Identify any guidance or instruction that has been promulgated or issued related to the administration or enforcement of the Anti-Diversity EOs, including but not limited to any instructions regarding how to determine whether grants or grant programs are “equity related” or contain DEI or DEI that violate federal antidiscrimination laws.

Response: See General Objections above.

Interrogatory No. 13: Identify the basis for Defendant’s termination of all grants issued pursuant to the Women in Apprenticeship and Nontraditional Occupations Act other than CWIT’s, including all individuals involved in the decision and any documents relied upon in making the termination decision.

Response: See General Objections above.

Interrogatory No. 14: Identify all grants or grant programs Defendants have terminated

because Defendant(s) have deemed those grants or grant programs promoted or contained DEI or DEIA that violated federal antidiscrimination laws, and for each such grant or grant program, identify the specific antidiscrimination laws that were violated, and how the terminated grants or grant programs violated those laws.

Response: See General Objections above.

Interrogatory No. 15: With respect to any grants identified in response to Interrogatory No. 14, explain how Defendants determined that termination of the grant was permissible given the constraint “to the maximum extent allowed by law” contained in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 16: Identify all guidance, instructions, or directions received by or created by Defendants related to the Certification Provision of Executive Order 14173 (Section 3(b)(iv)(B)), and the application of Section 3729(b)(4) of Title 31, United States Code, to any certifications made pursuant to the Certification Provision.

Response: See General Objections above.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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UNITED STATES DISTRICT COURT
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**U.S. DEPARTMENT OF JUSTICE AND ATTORNEY GENERAL
OF THE U.S. DEPARMTENT OF JUSTICE PAMELA BONDI'S
RESPOSNE TO PLAINITFF'S FIRST SET OF INTERROGATORIES**

Defendants United States Department of Justice and Attorney General Pamela Bondi (collectively, “DOJ Defendants”), by their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, responds to plaintiff Chicago Women In Trades’ First Set of Interrogatories to Defendants U.S. Department of Justice and Attorney General of the U.S. Department of Justice Pamela Bondi as follows:

General Objections

Defendants United States Department of Justice and Attorney General Pamela Bondi (collectively, “DOJ Defendants”) object to these interrogatories based on the reasons set forth in defendants’ motion for a protective order to stay discovery pending resolution of their motion to dismiss and the memorandum in support (“Stay Motion”). Dkt. 105, 106. Accordingly, DOJ Defendants withhold their responses to these interrogatories until the court resolves the Stay Motion and sets a response deadline to file responses. Until then, DOJ Defendants reserve all applicable objections to such interrogatory responses, including but not limited to the extent they seek information protected by any privilege, doctrine, or immunity, including the attorney-client

privilege, the work product privilege, the deliberative process privilege, the law enforcement privilege, and any other applicable privilege.

Interrogatory No. 1: Identify all grants that Defendants have terminated or threatened to terminate based on or as result of the Anti-Diversity EO^s, including but not limited to because Defendant(s) deemed those grants to be “equity related” and/or because Defendant(s) determined that a “counterparty or recipient . . . operate[s] [] programs promoting DEI that violate [] applicable Federal anti-discrimination laws,” and/or because a grantee refused “to certify that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.” For purposes of this interrogatory, “Identify” requests Defendant(s) to provide the name of the grant, the recipient of the grant, the amount of the grant, and the term of the grant.

Response: See General Objections above.

Interrogatory No. 2: Identify all individuals within DOJ that have responsibility for determining whether a grant should be terminated based on or as a result of the Anti-Diversity EO^s, including but not limited to individuals responsible for determining whether a grant is “equity related” or promotes or is in any way related to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 3: Identify all grants that Defendants have terminated or identified for termination because Defendant (s) have deemed they contain programming, promote, or in any way relates, to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 4: Describe in detail the process or methodology by which CWIT was identified as a grantee administering programs potentially in violation of the Anti-Diversity EO^s, including but not limited to, the source and type of information used, standards applied, the identifies and roles of each person who participated, including persons involved in deciding what process, methodology, standards specifying any computerized search tool or program used in the process.

Response: See General Objections above.

Interrogatory No. 5: Describe in detail the process or methodology by which Defendants identify grant programs that may be subject to compliance with the Anti-Diversity EO^s, including but not limited to specifying any computerized search tool or program used in the process or methodology.

Response: See General Objections above.

Interrogatory No. 6: Describe in detail what “illegal DEI” and “illegal DEIA” mean as

those terms are used at Section 2(a) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 7: Describe in detail how Defendants identify “DEI or DEIA performance requirements” as those terms are used in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 8: Describe in detail what “equity-related grants” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 9: Describe in detail what “DEI hires” means as that term is used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 10: Describe in detail how you determined that CWIT’s programs constitute illegal DEI in violation of the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 11: Describe in detail what “to provide or advance DEI, DEIA, or ‘environmental justice’ programs, services, or activities” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 12: Identify any guidance or instruction that has been promulgated or issued related to the administration or enforcement of the Anti-Diversity EOs, including but not limited to any instructions regarding how to determine whether grants or grant programs are “equity related” or contain DEI or DEI that violate federal antidiscrimination laws.

Response: See General Objections above.

Interrogatory No. 13: Identify the basis for Defendant’s termination of all grants issued pursuant to the Women in Apprenticeship and Nontraditional Occupations Act other than CWIT’s, including all individuals involved in the decision and any documents relied upon in making the termination decision.

Response: See General Objections above.

Interrogatory No. 14: Identify all grants or grant programs Defendants have terminated because Defendant(s) have deemed those grants or grant programs promoted or contained DEI or

DEIA that violated federal antidiscrimination laws, and for each such grant or grant program, identify the specific antidiscrimination laws that were violated, and how the terminated grants or grant programs violated those laws.

Response: See General Objections above.

Interrogatory No. 15: With respect to any grants identified in response to Interrogatory No. 14, explain how Defendants determined that termination of the grant was permissible given the constraint “to the maximum extent allowed by law” contained in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 16: Identify all guidance, instructions, or directions received by or created by Defendants related to the Certification Provision of Executive Order 14173 (Section 3(b)(iv)(B)), and the application of Section 3729(b)(4) of Title 31, United States Code, to any certifications made pursuant to the Certification Provision.

Response: See General Objections above.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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UNITED STATES DISTRICT COURT
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**OFFICE OF MANAGEMENT AND BUDGET AND DIRECTOR
OF OFFICE OF MANAGEMENT AND BUDGET RUSSELL VOUGHT'S
RESPONSE TO PLAINTIFFS FIRST SET OF INTERROGRATORIES**

Defendants Office of Management and Budget and Director of the Office of Management and Budget Russell Vought (collectively, "OMB Defendants"), by their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, responds to plaintiff Chicago Women In Trades' First Set of Interrogatories to Defendants Office of Management and Budget and Director of Office of Management and Budget Russell Vought as follows:

General Objections

Defendants Office of Management and Budget and Director of the Office of Management and Budget Russell Vought (collectively, "OMB Defendants") object to these interrogatories based on the reasons set forth in defendants' motion for a protective order to stay discovery pending resolution of their motion to dismiss and the memorandum in support ("Stay Motion"). Dkt. 105, 106. Accordingly, OMB Defendants withhold their responses to these interrogatories until the court resolves the Stay Motion and sets a response deadline to file responses. Until then, OMB Defendants reserve all applicable objections to such interrogatory responses, including but not limited to the extent they seek information protected by any privilege, doctrine, or immunity,

including the attorney-client privilege, the work product privilege, the deliberative process privilege, the law enforcement privilege, and any other applicable privilege.

Interrogatory No. 1: Identify all grants that Defendants have terminated or threatened to terminate based on or as result of the Anti-Diversity EO^s, including but not limited to because Defendant(s) deemed those grants to be “equity related” and/or because Defendant(s) determined that a “counterparty or recipient . . . operate[s] [] programs promoting DEI that violate [] applicable Federal anti-discrimination laws,” and/or because a grantee refused “to certify that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.” For purposes of this interrogatory, “Identify” requests Defendant(s) to provide the name of the grant, the recipient of the grant, the amount of the grant, and the term of the grant.

Response: See General Objections above.

Interrogatory No. 2: Identify all individuals within OMB that have responsibility for determining whether a grant should be terminated based on or as a result of the Anti-Diversity EO^s, including but not limited to individuals responsible for determining whether a grant is “equity related” or promotes or is in any way related to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 3: Identify all grants that Defendants have terminated or identified for termination because Defendant (s) have deemed they contain programming, promote, or in any way relates, to DEI or DEIA.

Response: See General Objections above.

Interrogatory No. 4: Describe in detail the process or methodology by which CWIT was identified as a grantee administering programs potentially in violation of the Anti-Diversity EO^s, including but not limited to, the source and type of information used, standards applied, the identifies and roles of each person who participated, including persons involved in deciding what process, methodology, standards specifying any computerized search tool or program used in the process.

Response: See General Objections above.

Interrogatory No. 5: Describe in detail the process or methodology by which Defendants identify grant programs that may be subject to compliance with the Anti-Diversity EO^s, including but not limited to specifying any computerized search tool or program used in the process or methodology.

Response: See General Objections above.

Interrogatory No. 6: Describe in detail what “illegal DEI” and “illegal DEIA” mean as

those terms are used at Section 2(a) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 7: Describe in detail how Defendants identify “DEI or DEIA performance requirements” as those terms are used in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 8: Describe in detail what “equity-related grants” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 9: Describe in detail what “DEI hires” means as that term is used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 10: Describe in detail how you determined that CWIT’s programs constitute illegal DEI in violation of the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 11: Describe in detail what “to provide or advance DEI, DEIA, or ‘environmental justice’ programs, services, or activities” means as those terms are used in the Anti-Diversity EOs.

Response: See General Objections above.

Interrogatory No. 12: Identify any guidance or instruction that has been promulgated or issued related to the administration or enforcement of the Anti-Diversity EOs, including but not limited to any instructions regarding how to determine whether grants or grant programs are “equity related” or contain DEI or DEI that violate federal antidiscrimination laws.

Response: See General Objections above.

Interrogatory No. 13: Identify the basis for Defendant’s termination of all grants issued pursuant to the Women in Apprenticeship and Nontraditional Occupations Act other than CWIT’s, including all individuals involved in the decision and any documents relied upon in making the termination decision.

Response: See General Objections above.

Interrogatory No. 14: Identify all grants or grant programs Defendants have terminated because Defendant(s) have deemed those grants or grant programs promoted or contained DEI or

DEIA that violated federal antidiscrimination laws, and for each such grant or grant program, identify the specific antidiscrimination laws that were violated, and how the terminated grants or grant programs violated those laws.

Response: See General Objections above.

Interrogatory No. 15: With respect to any grants identified in response to Interrogatory No. 14, explain how Defendants determined that termination of the grant was permissible given the constraint “to the maximum extent allowed by law” contained in Section 2(b)(i) of Executive Order 14151.

Response: See General Objections above.

Interrogatory No. 16: Identify all guidance, instructions, or directions received by or created by Defendants related to the Certification Provision of Executive Order 14173 (Section 3(b)(iv)(B)), and the application of Section 3729(b)(4) of Title 31, United States Code, to any certifications made pursuant to the Certification Provision.

Response: See General Objections above.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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UNITED STATES DISTRICT COURT
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Defendants.)

**DEFENDANTS' RESPONSE TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS**

Defendants, by their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, responds to plaintiff Chicago Women In Trades' First Set of Requests for Production to Defendants as follows:

General Objections

Defendants object to these requests for production based on the reasons set forth in defendants' motion for a protective order to stay discovery pending resolution of their motion to dismiss and the memorandum in support ("Stay Motion"). Dkt. 105, 106. Accordingly, defendants withhold their responses to these requests for production until the court resolves the Stay Motion and sets a response deadline to file responses. Until then, defendants reserve all applicable objections to such requests for production, including but not limited to the extent they seek information protected by any privilege, doctrine, or immunity, including the attorney-client privilege, the work product privilege, the deliberative process privilege, the law enforcement privilege, and any other applicable privilege.

Request No. 1: All Documents relating to any guidance, interpretation of, or application of the Anti-Diversity EO's, including enforcement, compliance, termination, or certification, issued or promulgated by an Executive Branch agency, including but not limited to fact sheets, press

releases, press statements, internal guidance to agencies and law enforcement, and guidance to government contractors or government grantees.

Response: See General Objections above.

Request No. 2: All Documents provided to government contractors or grantees regarding the Anti-Diversity EO's by Defendants or any Executive Branch official or agency, including, but not limited to: all documents used to instruct awardees, grantees, or contractors concerning compliance with the Anti-Diversity EO's; all communications terminating grants; all communications evaluating whether to terminate grants; and all communications seeking information on particular grants or programs that purportedly violate or relate to the Anti-Diversity EO's.

Response: See General Objections above.

Request No. 3: All Documents provided to government contractors, grantees, and/or recipients of federal funding terminating or threatening to terminate those contracts or grants because the contractor or grantee sponsors, supports, advocates for, or is otherwise involved in activities that relate to diversity, equity, or inclusion or DEI whether or not those activities are funded by federal grants, aid, or government monies.

Response: See General Objections above.

Request No. 4: All Documents related to search terms, phrases, or methodologies you approved for use identifying awards, grants, or contracts for review based on the Anti-Diversity EO's.

Response: See General Objections above.

Request No. 5: All Documents provided to government contractors, grantees, and/or recipients of government funding relating to actions taken or considered by Defendants or any Executive Branch official or agency related to the Anti-Diversity EO's, including communications to or from contractors or recipients of government money regarding modifications to their programs; communications to or from contractors or grantees seeking additional information or guidance on how to comply with the Anti-Diversity EO's; and communications relating to any disagreements with awardees, grantees, or contractors as to compliance with the Anti-Diversity EO's, including any notices or warnings of violation or breach of current grant obligations.

Response: See General Objections above.

Request No. 6: All Documents sufficient to show all grants that Defendants or any Executive Branch official or agency have terminated or identified for termination based on or as a result of Anti-Diversity EO's, including but not limited to because those grants are "equity related."

Response: See General Objections above.

Request No. 7: All Documents relating to all grants or fundings that Defendants or any Executive Branch official or agency have terminated, have threatened to terminate, considered for termination, or identified for termination on the grounds that the grants or fundings or government contractor or recipient of government monies sponsor, support, advocate for, or is otherwise involved in activities that relate to diversity, equity, or inclusion or DEIA.

Response: See General Objections above.

Request No. 8: All Documents relating to awards, contracts or obligations to which CWIT acts as the primary or sub-awardee, sub-grantee, or sub-contractor (collectively “Current Obligations”)

Response: See General Objections above.

Request No. 9: All Documents and Communications related to CWIT, including but not limited to memoranda analyzing the terms of any Current Obligations on the basis of the Anti-Diversity EOS, and memoranda analyzing any program or grant run by or affiliated with CWIT.

Response: See General Objections above.

Request No. 10: All Documents related to Defendants’ decision to terminate grants issued pursuant to the Women in Apprenticeship and Nontraditional Occupations Act, other than CWIT’s.

Response: See General Objections above.

Request No. 11: All Documents reflecting Defendants’ or any Executive Branch official’s or agency’s definition of the words “diversity,” “equity,” “inclusion,” or “accessibility” in relation to the Anti-Diversity EOs.

Response: See General Objections above.

Request No. 12: All Documents related to Defendants’ or any Executive Branch official’s or agency’s definition of the terms “DEI,” “DEIA,” or “equity-related” in relation to the Anti-Diversity EOs.

Response: See General Objections above.

Request No. 13: All Documents related to Defendants’ or any Executive Branch official’s or agency’s determination that any “equity-related” programming, or programming related to DEI or DEI violates federal antidiscrimination laws.

Response: See General Objections above.

Request No. 14: All Documents issued or promulgated by any Executive Branch agency relating to any guidance, interpretation of, or application of the False Claims Act in relation to the

Anti-Diversity EO^s, including but not limited to fact sheets, press releases, press statements, internal guidance to agencies and law enforcement, and guidance to government contractors or government grantees.

Response: See General Objections above.

Request No. 15: For each interrogatory set forth in Plaintiff's First Interrogatories, produce all Documents which Defendant referred to, relied upon, consulted or used in any way in answering such interrogatory.

Response: See General Objections above.

Request No. 16: All Documents that contain or otherwise relate to the facts or information that Defendants contend refute, in any way, the allegations contained in the Complaint in this action.

Response: See General Objections above.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: s/ Patrick Johnson
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